

1 McCormick, Barstow, Sheppard,
Wayte & Carruth LLP
2 Jonathan W. Carlson
Nevada Bar No. 10536
3 *jonathan.carlson@mccormickbarstow.com*
Cheryl A. Grames
4 Nevada Bar No. 12752
cheryl.grames@mccormickbarstow.com
5 7160 Rafael Rivera Way, Suite 320
Las Vegas, Nevada 89113
6 Telephone: (702) 949-1100
Facsimile: (702) 949-1101

Attorneys for GEICO CASUALTY COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

12 NICOLLE JONES PARKER, an individual,
13 Plaintiff,
14 v.
15 GEICO CASUALTY COMPANY, an entity
16 licensed to do business in Nevada; DOES I-X
and ROES XI-XX,
17 Defendants.

Case No. 2:24-cv-02396-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO FIRST AMENDED
COMPLAINT**

Second Request

19 Plaintiff NICOLLE JONES PARKER (“Plaintiff”), by and through her attorneys of record,
20 and Defendant GEICO CASUALTY COMPANY (“GEICO”), by and through its attorneys of
21 record, hereby file this Stipulation and Order to extend the deadline for GEICO to file its responsive
22 pleading to the First Amended Complaint (ECF No. 27, filed on Aug. 27, 2025). The current
23 deadline for filing the responsive pleading is October 10, 2025. The parties seek a ninety-day (90)
24 extension of that deadline to January 8, 2026.

25 The parties have good cause to seek an extension of the current deadline for responding to
26 the First Amended Complaint. Specifically, as indicated by the March 21, 2025 Notice of
27 Bankruptcy (ECF No. 20), Plaintiff initiated a bankruptcy action. In the course of the bankruptcy
28 proceedings, the U.S. Bankruptcy Trustee authorized resolution of Plaintiff's suit against GEICO.

Case No. 2:24-cv-02396-CDS-MDC

1 Following the previous request for an extension, the U.S. Bankruptcy Trustee awaits the outcome
2 of subrogation with Plaintiff's health insurer. Personnel at the Veterans Administration handling the
3 subrogation process are furloughed currently due to the federal government shutdown. As the parties
4 do not know exactly how long it will take for Veterans Administration's subrogation to conclude,
5 the parties now seek a longer extension of the instant deadline to avoid unnecessary litigation costs
6 being incurred that would affect the debtor's (now the U.S. Trustee's) estate. (ECF Nos. 25 and 26).
7 As such, the parties and their counsel submit that good cause exists for this extension of the
8 responsive pleading deadline.

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

